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**Cc:** Keener, Bill[Keener.Bill@epa.gov]; Zito, Kelly[ZITO.KELLY@EPA.GOV]; Huitric, Michele[huitric.michele@epa.gov]  
**From:** Huitric, Michele  
**Sent:** Mon 6/6/2016 8:54:47 PM  
**Subject:** FYI: NBC Bay Area - Hunters Point

Hi Mollie,

We wanted to give you a heads up that we have received the questions below from NBC Bay Area Producer Liz Wagner regarding EPA's work at the Hunters Point Naval Shipyard Superfund site in San Francisco. We are working with the program to provide a written response by COB today. We should be able to handle it on this end, but wanted to make sure you were aware, since some of the questions refer to HQ.

Thanks,

Michele

We understand that the EPA's position is that the Navy is the lead agency responsible for the cleanup and investigation of Hunters Point.

- As the government entity that is in charge of federal superfund sites and the agency that is overseeing the Navy's cleanup of Hunters Point, why would the EPA defer to the Navy?
- Can't the Navy speak about its own oversight of the Navy?

Dan Hirsch of UCSC said that in a phone call with EPA Region 9 and EPA headquarters, the officials at EPA headquarters said his analysis is correct—the region should not have used a 25 millirem per year standard or the Atomic Energy Commission's 1974 guide, and that averaging contamination across a site should not be used.

- Can the EPA confirm that the EPA headquarters agreed that these standards should not be used?
- Can the EPA confirm that the Navy shouldn't have used the standards referenced above?

We received the EPA's background information below. You said the UCSC presentation had some inaccuracies and left out some relevant information.

- What did the UCSC presentation include that was correct?
- Is the UCSC group correct in that the EPA should not have allowed the Navy to use the cleanup standards referenced above?
- Is the EPA saying that even if the Navy cleaned up to the standards referenced above, the EPA believes the risk that remains after the cleanup is still acceptable from a public health standpoint?

Isn't it true that for the cleanup of buildings and other structures, and equipment and waste, the Navy used a standard of 25 millirem per year and the Atomic Energy Commission's 1974 Regulatory Guide 1.86?

Isn't it true that EPA has repeatedly said that 25 millirem per year is not protective of public health and should not be used as a cleanup standard at Superfund sites?

- If so, why did the EPA allow the Navy to use that standard?

Isn't it true that EPA generally does not approve the use of the 1974 AEC Regulatory Guide at Superfund cleanups?

- If so, why did the EPA allow the Navy to use that standard?

Isn't it EPA's policy that Superfund cleanups at federal facilities are to employ EPA's Preliminary Remediation Goals?

- Why did the EPA allow the Navy to instead employ the non-EPA RESRAD model for estimating risk?

Isn't it true that EPA's guidance prohibits averaging contamination across an area like Hunters Point?

Please explain what the Navy's "protective cover" is.

Please explain what each of the EPA's risk models are.